

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** : **CHAPTER 13**  
**COURTNEY E. ROBINSON** :  
**DEBTOR** :  
: **BANKRUPTCY NO.: 18-15085-AMC**

**RESPONSE TO MOVANT'S MOTION FOR RELIEF**

Debtor ("Respondent"), by their attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

1. Admitted.
2. Admitted.
3. Denied. Movant's averment refers to documents on record before the Court. The Debtor does not attest to the veracity of said documents, thus the factual averments in Movant's corresponding paragraph are denied.
4. Admitted.
5. Admitted.
6. Denied. Debtor denies the accounting contained in the Movant's averment. Should any payments be due at this time, the Debtor intends to cure.
7. Denied. Debtor denies the accounting contained in the Movant's averment. Should any payments be due at this time, the Debtor intends to cure.
8. Denied. Movant's averment is a conclusion of law to which no response is required.
9. Denied. Movant's averment is a conclusion of law to which no response is required.

WHEREFORE, Debtor prays that the Movant's Motions be denied.

Date: January 3, 2022

/s/ Brandon J. Perloff  
Brandon J. Perloff Esquire.  
Attorney for Debtor